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Via Email

January 15, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007
Netburn_NYSDChambers@nysd.uscourts.gov

Re: *Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev.*
Corp., 04-cv-1923 (S.D.N.Y.) (GBD) (SN)

Dear Judge Netburn:

This letter is filed in accordance with (i) Protective Order, ECF No. 1900, attached hereto; (ii) the parties' stipulation, dated October 21, 2019, attached hereto; and (iii) Your Honor's Individual Rules. The O'Neill Plaintiffs request to file under seal portions of the Affidavits of Jerry S. Goldman, Esq., John P. O'Neill, Jr., Carol A. O'Neill, and Christine I. O'Neill in Support of Plaintiffs' Motion for Class Certification and Related Relief and file the Affidavits in redacted form on the public docket. The Affidavits contain sensitive personal information [REDACTED]

[REDACTED] The request to redact certain sensitive personal information is supported by [REDACTED] strong privacy interest. *See Edwards v. Khalil*, 12-cv-8442, 2016 U.S. Dist. LEXIS 44407, at *3 n.5 (S.D.N.Y. Mar. 31, 2016) (recognizing the appropriateness of filing sensitive personal information under seal).

With this letter, Plaintiffs submit (1) a .pdf of Plaintiffs' Motion for Class Certification and Related Relief, highlighting all proposed redactions in the Affidavits containing sensitive personal information; and (2) a .pdf containing clean copies of the particular pages Plaintiffs' seek to have redacted and filed under seal.

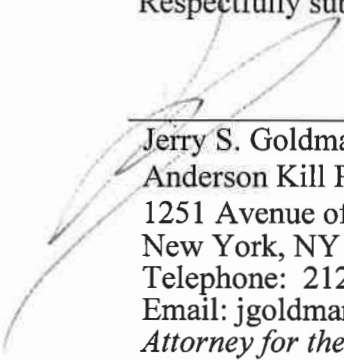
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We thank the Court for its attention to this matter.

Respectfully submitted,



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